

EXHIBIT 116

**DECLARATION UNDER PENALTY OF PERJURY
PURSUANT TO 28 U.S.C. § 1746
AND/OR
SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW**

1. My name is Melanie Manning. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of DeKalb County in Georgia and my residence address is [REDACTED], Dunwoody, GA 30338.
3. On November 6, 2018, I was a Poll Watcher at IGL BAUTISTA NUEVA JERUSALEN, 5300 Williams Rd, Gwinnett, Precinct 123. This was my fifth time working as a Poll Watcher.
4. I arrived at 6:20am with my credentials, introduced myself to the polling site manager, and requested to observe opening procedures from a position out of the way. My request was denied and I was instructed to wait outside with the voters who were already lining up. I did not see Opening Procedures or a zero tape. I entered the Polling site at 7:00am with the voters.
5. I found the process at the polling site to be inefficient, which resulted in long lines all day. The Poll Manager was uncooperative and sometimes contentious with Poll Watchers.
6. I witnessed multiple bottleneck delays which resulted from one of the two Express Poll computers repeatedly freezing up or rebooting. After the third such incident I let the Polling Manager know that I had the ability to report

the delays and possibly help her by getting her a third computer delivered. She told me everything was fine and she didn't need my help. She did not explain what was causing the problem.

7. I witnessed multiple accounts of staff sending people away to another polling site in the same county, without offering them the option to cast a provisional vote at that site. Voters waited in line for more than an hour in line before being told that they needed to go elsewhere to vote. After the second such incident, I informed the Polling Manager that this was happening and she instructed the staff to offer voters the option to cast a provisional vote. However, after the staff changed in the afternoon, they reverted back to the original practice of sending voters away without offering provisional voting as an option.
8. The site was equipped with two Express Poll computers and seven voting machines. If one or two voters were not immediately found in the computers, the entire line was held up while poll workers continued to search for them. I witnessed numerous occasions where no voters were voting at all while the line was held up at the Express Poll look-up computers.
9. I spent a lot of time outside the polling place. I noticed many cars pull into the parking lot and leave – presumably because of the length of the line. I

also noticed people who walked toward the line and left without voting when they saw how long the line was. In my opinion, the length of the line negatively affected the number of people voting.

10. People were frustrated in the line and confused about the lengthy delays.

Voters in line complained that these long lines were why they rarely vote or hate to vote. I was at the very end of the line, checking registration status and verifying voters' polling locations during the second half of the day.

11. Every hour, the poll workers stopped all voting and cleared all machines to count votes. They stopped the line, collected numbers from the machines, wrote the total number of people who voted on a sign posted on the wall near the door, and then resumed the voting. The process took between 5-10 minutes every hour, resulting in regularly scheduled downtime with no votes being cast.

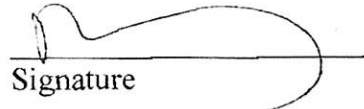
12. I spoke with at least five voters who had previously voted at this location, hadn't moved residences, but who were no longer found in the voter rolls. A common thread among them was that the last time they voted was in 2012.

13. I noticed that the site did not have an efficient method for addressing voters who could not be found in the computer. Addressing these issues at one or both of the two Express Poll computers held up the line and left voting machines empty while the line continued to stack up outside. During the

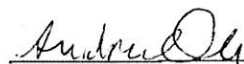
day, three people from the Department of Justice came and stayed for a while, though I am not sure why. I stayed at the site until 6:30pm.

14. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
15. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
16. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 15 day of November, 2018.


Signature

Sworn to and subscribed before me
This the 15 day of November, 2018.


Notary Public

